

USDC - BALTIMORE
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Terance Albert Tracy

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

**Robert Joseph Ray, Robert Jones Jr.,
City of Annapolis Board of Elections
Anne Arundel Cnty Board of Elections**

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. LK6-23-2711
(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☒ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Terance Albert Tracy
Street Address	180 Woods Drive
City and County	Annapolis- Anne Arundel County
State and Zip Code	Maryland, 21403
Telephone Number	
E-mail Address	

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Robert Joseph Ray
Job or Title (if known)	Election Judge for City of Annapolis
Street Address	106 Stone Point Drive
City and County	Annapolis- Anne Arundel County
State and Zip Code	Maryland 21401
Telephone Number	
E-mail Address (if known)	

Defendant No. 2

Name	Robert Jones Jr.
Job or Title (if known)	Election Judge AA County, Md
Street Address	715 S Cherry Grove Ave
City and County	Annapolis - Anne Arundel County
State and Zip Code	Maryland 21401
Telephone Number	
E-mail Address (if known)	

Defendant No. 3

Name	Board of Elections Supervisors Annapol
Job or Title (if known)	Keanuú Smith-Brown, Chair
Street Address	160 Duke of Gloucester St
City and County	Annapolis City, Anne Arundel County
State and Zip Code	Maryland 21401
Telephone Number	(410) 263-7929
E-mail Address (if known)	cityclerk@annapolis.gov

Defendant No. 4

Name	Board of Elections- AA County, Md
Job or Title (if known)	
Street Address	6740 Baymeadow Dr
City and County	Glen Burnie, Anne Arundel County
State and Zip Code	Maryland 21060
Telephone Number	(410) 222-6600
E-mail Address (if known)	elections@aacounty.org

(If there are more than four defendants, attach an additional page providing the same information for each additional defendant.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1st Amendment, 4th Amendment, 14th Amendment of The U.S. Constitution

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See Attachment "A"

This image shows a full page of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page, typical of notebook paper. There are no margins, text, or other markings on the page.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

See Attachment "A"

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/03, 2023.

Signature of Plaintiff

Printed Name of Plaintiff


Terance A. Tracy

(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

Email Address

Attachment "A" to Civil Complaint

Case Number _____

I. JURISDICTION

1. This court has jurisdiction under 28 U.S.C. § 1331 and 28 U.S.C. § 1343. Federal question jurisdiction arises pursuant to 42 U.S.C. § 1983.

II. VENUE

1. Venue is proper pursuant to 28 U.S.C. § 1391 because this matter involves Constitutional questions of the First, Fourth and Fourteenth Amendments to The Constitution of The United States and Respondents acted under "Color of Law" and in this District

III. PARTIES

Petitioner(Pro Se): Terance A Tracy resides in City of Annapolis, Anne Arundel County, Md.

Respondent (1): Robert Jones Jr. in his personal capacity and in his official capacity as a Contractual Temporary Training Agent for Anne Arundel County Board of Elections and residing in Annapolis, Md

Respondent (2): Robert Joseph Ray in his personal capacity and as Contractual Chief Election Judge for City of Annapolis Board of Elections and residing in Annapolis, Md

Respondent (3); City of Annapolis Board of Supervisors of Elections

Respondent (4); Anne Arundel County Board of Elections

IV. STATEMENT OF FACTS

1
2
3 1. Petitioner arrived at Pip Moyer Rec Center to get information and visit the
4 public gym and workout area at the front entrance to the center. After his business
5 there, he noticed signage pointing to early voting at the back of the Rec Center.
6 Petitioner believed, correctly, that this was the designated voting site for him to
7 vote in the 2022 Election. Being a reporter of mostly local news, petitioner
8 decided to visit the voting location for two reasons; to ascertain whether paper or
9 electronic ballots were being used there and to get a brief video relative to his visit
10 there for a later broadcast on the election.
11

12 2. Petitioner has been covering local news via posting videos to YouTube and has
13 also been featured in other local news publications since late 2021. Petitioner is an
14 reporter and his work generally covers local politics and law enforcement. Being
15 quite familiar with protected First Amendment activity, petitioner knew that he
16 could not enter the polling area without prior permission, according to the AA
17 County Elections website, on that day but also understands he was allowed to film
18 on a public sidewalk anything that could be seen with the eyes. The only notable
19 signage at the open door is a "turn cellphones off". The same signage can be seen
20 inside the building.

21 3. This entire encounter was captured with both audio and video on 2 devices. The
22 encounter is best described from the videos posted in their entirety on Petitioner's
23 Channel called "Annapolis Audit" on YouTube as follows;

24 Petitioner approaches the open door to the polling location at 1:35

25 Petitioner narrates video saying that it appears that paper ballots were being used at
26 2:14

1 A unidentified poll worker offers petitioner help and petitioner explains he just wanted
2 to "check out the process" at 2:16

3 Mr Ray, alerted by the poll worker to the petitioner's presence, looks up and notices
4 petitioner at 2:19

5 Mr Ray rises and aproaches petitioner at 2:35

6 **Mr Ray and Petitioner;**

7 Mr Ray advises petitioner, "You cant do that", petitioner answers, "Why not". Mr Ray
8 advises, because you cant", Similar dialouge continues.

9 Mr Ray finally says, "I don't have to explain it to you, do you want me to call the
10 police"? at 3:10

11 Mr Ray returns to his table and retreives his county issued cell phone. Petitioner
12 remains just outside the entry way and Mr Ray returns, phone in hand at 3:38

13 Petitioner again asks for an eplanation. Mr Ray, in a raised voice exclaims, "I don't have
14 to explain myself to you for anythng, get the hell out of here"! at 3:42

15 Mr Ray looks into camera, "Don't you dare turn that fu**ing thing on"! while
16 approaching closely to petitioner at 3:43

17 Petitioner, "It's on" at 3:45

18 Election worker inside voting area calls out, "stop, Bob" at 3:46

19 Mr Ray makes contact with 911 at 4:06

20 Mr Ray advises 911 operator, "I have a guy here causing a scene with a camera and he
21 wont leave" at 4:14

22 Mr Ray to petitioner, again loud, "Take that F**king thing away from my face" while
23 still blocking the interior view from the sidewalk at 4:43

24 Petitioner advises Mr Ray can step away from him but rather himself steps back from
25 Mr Ray at at 4:46

26 Mr Ray advises 911 that petitioner has his camera in his face "taking movies of me"
27 trying to film the site and I want him removed from the premises at 5:00

1 Petitioner remains back from the doorway, yielding to foot traffic and assists Mr Ray
2 with his description of himself and also gives his full legal name to relay to the 911
3 operator at 5:18

4 Mr Ray asks, "would you stand by until the officers get here"? Petitioner answers in the
5 affirmative at 5:35

6 Mr Ray exclaims loudly, "Get the hell out of my way", backing petitioner onto grassy
7 area at 5:50

8 Petitioner assists a voter with information pertaining to a handicap access as Mr Ray
9 continues with 911 at 5:52

10 Mr Ray at all times during this interaction blocked the view inside the polling area.

11 Mr Jones enters the scene from inside the building and approaches petitioner at 6:00

12 **4. Alleged Assault Narrative;**

13 Mr Jones Jr exits the building at 6:00

14 911 Advised Mr Ray to "Walk Away" at 6:05

15 Mr Ray hangs up with 911 at 6:16

16 Mr Ray advised Mr Jones Jr that he already called the police and they're "on the way"
17 at 6:36

18 Mr Ray, "I know, that's why I got him to back up." -responding to Mr Jones Jr. at 7:25

19 Petitioner moves himself from the grass near the door to the sidewalk, farther from the
20 entry door, and Mr Jones Jr approaches him, finger pointed at his face. He proclaims,
21 "you dont have the right to film me" at 7:29

22 Petitioner, "really"? at 7:31

23 "You cannot film me unless I give you permission" at 7:34

24 Petitioner. "really"?

25 Mr Jones Jr quickly steps to petitioner and grabs for the camera at 7:35

26 Mr Jones grabs petitioner's wrist and maintains grasp, now with his right hand under

1 petitioner's left arm, both hands grasping petitioner's right wrist at 7:37

2 Mr Jones Jr, yelling, "I said dont film me"! at 7:39

3 Mr Jones Jr spins petitioner, still in his 2 handed grasp, towards the textured concrete
4 wall at 7:40

5 Mr Jones Jr takes a closed fist swing at petitioner as petitioner recovers from throw at
6 7:42

7 Mr Jones Jr tackles petitioner into textured concrete wall, causing injury to petitioners
8 head at 7:44

9 Wrestling around ensues at 7:46, continues until others arriving upon the scene wrestle
10 petitioner to the ground, having not witnessed the initial attack and, with Mr Jones Jr still
11 attacking petitioner at 8:01

12 Mr Jones Jr can be seen at 8:08 punching petitioner with a closed fist while petitioner
13 remains helpless on the ground, still held down by others.

14 Mr Ray pleads with Mr Jones Jr., still on top of petitioner and attacking, "Robert, Umm
15 Umm, Robert. Come on buddy, knock it off"... "Stop, buddy, stop" at 8:10 - 8:15 and
16 leads him away.

17 Fight disengages as Mr Ray pulls Mr Jones Jr up from the petitioner at 8:15

18 Female witness encourages Mr Jones Jr to return inside the building, "get in there, Rob..
19 Get in there, Rob", pointing at the doorway. He remains on the sidewalk instead at 8:22

20 Petitioner attempts to enter the building to aid himself and his still bleeding head
21 wound. Other witnesses deny him entry, indifferent to his obvious injuries at 8:45

22 Officer Matthew Pfau of Annapolis City Police arrives and first notices petitioners
23 wounds and offers care before taking any other action.

24 In the posted video, no futher relevant action takes place not covered in officer Plau's
25 Incident report. [See; Exhibit "1"]

26

27 5. Petitioner was unable to gain any useful video footage or information of the

1 election area that day. As a result of the assault by Respondent Jones Jr., the
2 Petitioner was taken by ambulance to the local hospital having sustained injuries
3 to his knees, arms, back as well as a deep laceration into the rear of his head
4 requiring 3 metal staples to close.
5

6 **6.** Petitioner sustained damage to his equipment including destroying a GoPro
7 video device having cracked the screen and causing internal damage, destroyed a
8 camera mounting device and a broken chest mounting device for the GoPro.
9

10 **7.** Petitioner accumulated expenses due to the assault including: Ambulance
11 transport, Emergency room visit, follow up visits. Petitioner suffered headaches
12 for 3 months following that day and was further treated by a physician. Petitioner
13 accumulated additional related expenses and other damages to clothing.
14
15

16 **Claim I**

17

18 **1.** It is well established by the facts contained here from the video and memory,
19 and in the Officer Pfau's Police Incident Report{Exhibit 1} that the Petitioner was
20 conducting First Amendment protected activity at the Polling location that day.
21 The Petitioner remained on a public sidewalk at the doorway to the voting room,
22 kindly yielding to at least 6 voters over the course of the incident there. Petitioner
23 was there for the sole purpose of news gathering. Local and municipal laws are
24 generally silent on the issue of videoing a voting location from the entryway and
25 only require the entry way not be blocked to voters. And, in fact, all State, County
26 and Annapolis Municipal statutes and codes allow press activity inside of the

1 voting area pursuant to common sense privacy rules. The contracts signed by
2 respondents Jones Jr and Ray both state the they should contact The Anne Arundel
3 County Board of Elections Help Desk with questions regarding policy.
4

5 2. The Freedom of The Press is well established among the general population
6 and The States in time immemorial and a polling place during a contentious
7 election cycle is commonly a place at which the media would be expected to
8 appear. Other local press entities have published pictures of Pip Moyer Recreation
9 Center during previous election cycles both inside and outside on the voting area
10 {See Exhibits 2-3}, apparently unscathed. Petitioner should enjoy no less freedom.
11

12 3. Respondents Jones Jr and Ray acted jointly and violated Petitioner's First
13 Amendment Freedom of Press by blocking Petitioner's access to view and video
14 the voting area unmolested for a brief time in order to later produce a news
15 broadcast of public interest and contrary to The County training Manual provided
16 to them and contrary to any State and Local statutes. These actions are in violation
17 of prior restraint.
18

19 **Claim II**

20 1. It is well established that recording in public, from a public sidewalk, is
21 Constitutionally protected activity. Petitioner was peacefully and quietly
22 recording, Petitioner through the course of this interaction never raised his voice,
23 asked legitimate questions regarding his presence there, was courteous towards
24 citizens attempting to vote and never escalated the situation. In the interaction and
25 upon Respondent Jones Jr's entrance to the scene, Respondent Jones Jr. failed to
26 use his training as a "Training Associate" to deescalate the situation. Instead,
27 Respondent Jones Jr physically attacked Petitioner using force enough to severely

1 injure Petitioner and break his recording equipment. It was 1 minute and 36
2 seconds from the time Respondent Jones Jr exited the voting room until grabbing
3 Petitioner's arm and the ensuing assault.

4
5 2. Respondent Jones Jr. did use unreasonable and excessive force in violation of
6 The Fourth Amendment to The Constitution of The United States as conveyed to
7 The States by The 14th Amendment. A reasonably competent official would
8 understand that what he is doing violates that right.

9
10 3. Respondent Jones Jr did act jointly with respondent Ray to deny Petitioner's
11 First Amendment Right to Free Press and Petitioner's First Amendment Right to
12 Free Speech as applied to The States by The Fourteenth Amendment. Respondent
13 Jones Jr did act independently to deny petitioner's Constitutional Rights to Free
14 Press and Free Speech as applied to The States by The Fourteenth Amendment.

15
16
17 **Claim III**

18
19 1. A Monell Claim under Sec. 1983 against Respondent(3) City of Annapolis
20 Board of Supervisors of Elections. Petitioner asserts That Respondent 3 is libel
21 under Sect 1983 owing to The Board's deliberate indifference regarding the
22 obvious intersection of a National election and the media. Respondent 3
23 ommited training it's election judges regarding Constitutionally protected
24 activities outside of the polling room. Respondent 3 also delegates
25 responsibility for security regarding polling locations to The Election Judges.

26
27 2. Respondent 3 functions under a Municipal Code via The City of Annapolis. In

1 that Municipal Code, The Annapolis City Council grants The Board of Election
2 Supervisors “ultimate decisionmaking authority under that
3 chapter”(4.08.030 _Annap Mun Code). Among those authorities is the
4 responsibility to “appoint judges”(4.08.050 _Annap Mun Code). The Code
5 goes on to say, “Judges shall receive a course of instruction administered by
6 The Board”(4.08.050(G)_Annap Mun Code), and that “all judges shall take and
7 subscribe to the oath presented in Article 1 Sect 9 of The Constitution of
8 Maryland”(4.08.050(E)_Annap Mun Code).

9 3. It goes on, “The Board shall have power to make all necessary rules and
10 regulations, not inconsistent with this chapter with reference to... the conduct
11 of elections”(4.08.070(B)_Annap Mun Code). The Code further states that,
12 “Each of the Chief Judges has authority to keep the peace and cause any person
13 to be arrested for a breach of peace”(4.24.10 _Annap Mun Code), “and it shall
14 be the duty of officers of the law present to obey the order of any Chief Judge,
15 and an officer making an arrest by the discretion of a Chief Judge shall be
16 protected in so doing fully as if a warrant had been issued to that officer to
17 make such arrest”(4.24.10 _Annap Mun Code).

18 4. However, there is no local rule or any statute that specifically regulates media
19 activity outside of the polling room. The Board is also silent on media activity
20 there. There is no guidance in the training manual and there appears, at least, to
21 be no formal training by Respondent 3 on such activity. Maryland's only law
22 regarding a “zone” around polling places is 16-206(b)(2)(i) and only concerns
23 electioneering activity in that designated zone with no mention of media
24 activity. In the case *supra*, entry zones to polling rooms are left ambiguous and
25 leave discretion to a final arbitrator, The Chief Judges.

26 5. Surrounding states are clear and unambiguous over media activity outside of
27 polling rooms. Virginia and Pennsylvania have clearly articulated rules about a

40 foot and 10 foot zone outside of polling places respectively. Both States ban media in those zones and both require clear signage be posted regarding those rules. West Virginia lays out a 100 foot zone to entrances to polling rooms but specifically allows media in that zone, again with signage by regulation.

6. Surrounding States clearly lay out rules regarding media in these zones with municipal regulation, proper signage and demarkations. And, voters and the media can also find the same language on those State's respective public websites. Similar language is laid out in all of those State's Judges training manuals as well.
7. The First Amendment guarantees a Right to Free Speech and Free Press as conveyed to The States via The Fourteenth Amendment and is violated here by Respondent 3 under a Monell claim. The Respondent is granted the responsibility to administer an election in The City of Annapolis. Respondent 3 then grants powers to Chief Election Judges to carry out their training and instruction as delegated during an election giving those judges discretionary powers{Exhibit 4}, even up to an arrest with the power of a warrant in the same manner as issued by a Court of Law.

Claim IV

1. Similar to Claim III, Petitioner asserts that Respondent 4, Anne Arundel County Maryland Board of Elections, violated the Petitioner's First Amendment protected activities of Free Speech and a Free Press as well as his 4th Amendment protected right to be free of unreasonable force as conveyed to The States by The Fourteenth Amendment. Respondent 4 is liable under a Monell claim.
2. Also similar to Claim III, The Anne Arundel County Board of Elections

functions under Anne Arundel County Codes and The County Exeuctives grants powers to Respondent 4 to administer elecions within the County. Respondent 4 hires Assistant Training Associates with the mandate to train Election Judges in all areas of The County. Further duties include; “work with the Training Supervisor to develop a Train the Trainer Syllabus” and “meet regularly with Board of Elections Training Supervisors to discuss training program issues”. Their election day duties include,”evaluating polling places and providing field support” Field support is ambiguosly defined in as much as the Assistant Training Associate's actual specific functions on election day.

3. Contained in the Assistant Training Associates acceptance letter from Respondent 4, it states, “Temporary employees of The Anne Arundel County Board of Elections are considered employees of The Board of Elections and The State of Maryland for all employment matters including hiring, discharge,and the administration and enforcement of all employment laws and regulations. Anne Arundel County is not your employer, but provides all administrative payroll services and funding to The Board”{Exhibit 5}.
4. The actions of Respondent 1, Jones Jr. in his Official Capacity, were not a discredionary function and violated clearly established Constitutionally protected activities a reasonable person would know.
5. Respondent 4 failed to train it's assistant trainers regarding media presence outside of polling locations, And, like The Annapolis Board of Election Supervisors, left ambiguity in it's Assisant Training Associates functions at polling locations on elections days. These ommisions left The Assistant Training Associate as the final arbitrator of his decisons to offend Petitioner's Constitutionally protected activities that day.

Conclusion

1. Petitioner demonstrates here a deliberate indifference where a lack of policy regarding the intersection of Constitutionally protected activity such as voting, speech, press and the right to be free from unreasonable force trickle down to acts of suppression by State actors, both given discretion to the same. Other surrounding State and local jurisdictions make clear their policies of that same intersection. Here we have separate acts of suppression in one incident by two respondents, both acting under color of law and both using the same manuals, same training sessions, (including one being a “training associate”), and both acting under the same local rules and State statutes.

2. Both the County's and the City's respective Election Boards omission of regulation, training and guidance on protected activity outside of voting rooms and exterior spaces combined with their ambiguity of the duties and Constitutional limitations of their direct employees violates Petitioner's rights and survives a Monell claim under Section 1983.

Relief as to Claim I

1. Petitioner prays The Court for relief under Section 1983 from Respondent 2, Robert Joseph Ray, for punitive damages in the amount of \$50,000.00

Relief as to Claim II

1. Petitioner prays The Court for relief under Section 1983 from Respondent 1,

1 Robert Jones Jr., for punitive damages in the amount of \$75,000.00.

2 2. Petitioner prays The Court for releif under Section 1983 from Respondent 1,
3 Robert Jones Jr., for compensatory damages for medical care, broadcast
4 equipment replacement and expenses in the amount of \$3200.89{See Exhibits 6 -
5 9}
6

7 **Relief as to Claim III**
8

9 1. Petitioner prays The Court for relief under Section 1983 from Respondent 3,
10 City of Annapolis Board of Election Supervisors, for punitive damages in the
11 amount of \$25,000.00
12

13 **Relief as to Claim IV**
14

15 1. Petitioner prays The Court for relief under Section 1983 from Respondent 4,
16 The Anne Arundel County Board of Elections, for punitive damages in the amount
17 of \$40,000.00
18

19 **Further relief**
20

21 1. Petitioner prays The Court for relief under Section 1983 for all court costs
22 and all fees as determined by The Court or The Clerk, to be paid by Respondents
23 equally and any further relief as The Court determines proper.
24

25 2. Petitioner prays the court injunctive releif to direct Respondents 3 and 4 to
26 update training literature and techniques to reflect a policy regarding photography
27 and news gathering at polling entrances consistent with Constitutionally protected

activities.

Respectfully submitted to The Court for consideration, Petitioner swears and affirms
that the contents of this Action are true and factual to the best of his knowledge;

Signed(Petitioner) Terance A Tracy Date; 10 - 03 - 2023

Terance A Tracy